

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

REVIEW OF FEDERAL COMMUNICATIONS)	
COMMISSION'S TRIENNIAL REVIEW ORDER)	CASE NO.
REGARDING UNBUNDLING REQUIREMENTS)	2003-00379
FOR INDIVIDUAL NETWORK ELEMENTS)	

ALLTEL KENTUCKY, INC. AND KENTUCKY ALLTEL, INC.
RESPONSE TO DATA REQUEST OF COMMISSION STAFF
TO INCUMBENT LOCAL EXCHANGE CARRIERS

Kentucky ALLTEL, Inc. and ALLTEL Kentucky, Inc., ("ALLTEL") pursuant to the Kentucky Public Service Commission's ("KYPSC") Order in this docket issued on October 2, 2003, provides the following responses to the KYPSC Staff's data requests contained in the above referenced order.

DATA REQUESTS

1. For each corporate entity, including affiliates, for whom the ILEC is providing any type of collocation service, transport service, loop service, DS1 or greater switching service, DS0 switching service, or interconnection service, provide the following information. In the response, distinguish those companies that are known to own and provide at least a portion of their own switching services from those entities that do not own or provide a portion of their own switching services.
 - a. The identity of the corporate entity, indicating whether the ILEC has any ownership or affiliate interest.

ALLTEL RESPONSE: See Attachment "A". ALLTEL has no ownership or affiliate interest in any of these companies. Of the carriers listed in Attachment "A", AT&T Broadband Phone of Kentucky, LLC, Brandenburg Telecom LLC, North Central Communications, Inc., NuVox Communications, Inc., South Central Telecom, LLC, SouthEast Telephone, Inc., and Telcove own or have access to non-ALLTEL switching facilities.

- b. A list of all specific services (bundled or otherwise) for which the entity is billed by wirecenter, indicating whether the service is being provided on either a retail or wholesale basis.

ALLTEL RESPONSE: See Attachment "A". All services in Attachment "A" are billed on a wholesale basis. This exhibit contains total monthly billing for each item. Price per item information can be found in our ICAs and tariffs.

- c. The non-recurring and recurring prices of all bundled or individual services for which the entity is billed, indicating which are being provided on an unbundled basis. The rates in this response should correspond to the listed services provided in (b) above.

ALLTEL RESPONSE: See Attachment "A".

- d. If different terms, conditions, or rates exist from published tariffs (i.e., by special contract), identify each term, condition, or rate differential for each service for each entity.

ALLTEL RESPONSE: All local interconnection services except collocation are pursuant to interconnection agreements.

- e. The total annual revenue generated (billed) for each entity.

ALLTEL RESPONSE: See Attachment "B". This data reflects one month (the month used for exhibit A) annualized.

2. For each wirecenter containing a DS0 type switch and serving the "Mass Market," provide the following information:

- a. The total number of "Mass Market" customer accounts.

ALLTEL RESPONSE: See Attachment "C". This information is presented by exchange because the data was not available by wirecenter as requested.

- b. The total annual revenue generated from these accounts, including a breakout of Plain Old Telephone Service revenue, long distance revenue, wireless (phone and pager) revenue, Internet revenue, and all other revenue.

ALLTEL RESPONSE: ALLTEL objects to this Interrogatory as it is irrelevant and extremely proprietary in nature. Subject to and without waiving the foregoing objections, see response to BellSouth Interrogatory Number 29.

- c. The number of customers and the revenue per customer account lost in 2002 and 2003 to a competitor. Identify the competitor.

ALLTEL RESPONSE: See Attachment "D". Please note that these numbers reflect only customers that have left the ALLTEL system since ALLTEL has owned the former Verizon properties (August 2002 thru October 2003). Customers lost to a competitor during this time period are shown by carrier. The remaining net access lines lost are likely due to voice competition without porting, wireless replacement and economic conditions, none of which is fully quantifiable. For example from January 2003 thru October 2003 there have been 902 customers that have advised ALLTEL that they have left the ALLTEL network and opted for wireless service only. ALLTEL does not know how many more customers may have done so without advising of their reason or that are new accounts that were never served by ALLTEL. The average revenue per customer account lost in 2002 was \$56.68. The average revenue per customer account lost in 2003 was \$62.79.

3. Identify each wirecenter for which "Mass Market" customers are being served by switches other than DS0 switches. Explain how these customers are being served.

ALLTEL RESPONSE: ALLTEL currently does not have any non-DS0 switches. However there are customers in ALLTEL's service territory that are served by non-ALLTEL switches, some of which may be served by switches other than DS0 level switches. There are facility based CLECs serving customers in the Elizabethtown, Lexington, London, Glasgow, and Scottsville exchanges of Kentucky ALLTEL, Inc. and in the Zoneton and Shephardsville exchanges of ALLTEL Kentucky, Inc. who utilize non-ALLTEL switches. Additionally there are customers served by broadband providers that are switched outside of ALLTEL's network and customers throughout ALLTEL's service territory that have left the wireline network for wireless only service that are served by wireless switches.

4. Provide a copy of the ILEC's most current Strategic Plan/Outlook for 2003 – 2006 pertaining to the "Mass Market" as defined by the FCC, including discussions of current and future market conditions, company reactions to potential and actual competitive entry, company market preservation and recapture strategies, and revenue projections.

ALLTEL RESPONSE: This information is not available

5. Explain whether or not a batch-cut migration process needs to be implemented by ILECs in the state. Identify any and all factors that warrant this conclusion.

ALLTEL RESPONSE: ALLTEL does not believe that a batch-cut migration process needs to be implemented in Kentucky. Since August 2002, ALLTEL has had only 5 CLECs request a total of 69 hot cuts out of 218 loops ordered. ALLTEL is not aware of any problems with the current procedures.

6. Assume that a batch-cut migration process will be implemented, and respond to the following:

- a. What is the appropriate volume of loops to be included in the “batch” and why?

ALLTEL RESPONSE: Since ALLTEL does not believe that a batch cut migration process is needed, ALLTEL has not investigated the issues being questioned and therefore takes no position on them at this time.

- b. Identify and explain the specific processes that should be employed when a batch cut is performed.

ALLTEL RESPONSE: See response to Data Request No. 6.a.

- c. What type of completion interval metric should be used to monitor performance and why?

ALLTEL RESPONSE: ALLTEL sees no need for a batch cut process. Accordingly, ALLTEL does not see the need for any performance metrics associated with batch cut processes.

- d. Identify and explain why any existing loop performance metrics should be expanded to account for a batch-cut process.

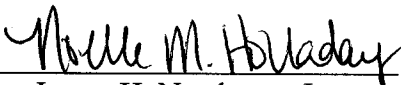
ALLTEL RESPONSE: See response to Data Request No. 6.c.

- e. What are the appropriate TELRIC rates for the batch-cut activities?

ALLTEL RESPONSE: See response to Data Request No. 6.a. However ALLTEL believes that if a rate is developed, it should recover all costs and allow for a fair return on investment.

Respectfully submitted,

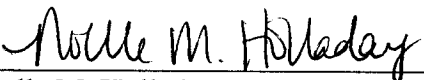
ALLTEL Kentucky, Inc
Kentucky ALLTEL, Inc.

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing redacted Responses to Staff's Data Requests were served on parties participating in electronic transmission by electronic mail, and that all other parties on the attached service list were notified by letter of the filing of this document, and were given an opportunity to receive a paper copy of this document by making a request to the undersigned attorney.

This 4th day of December, 2003.


Noelle M. Holladay

ATTACHMENT "A"
ALLTEL response to KYPSC Staff DR No. 1.a., b., c., & d.

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Kentucky ALLTEL, Inc.

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Kentucky ALLTEL, Inc.

Company	CLLI Code	Tariff/ICA	Description	Qty.	Rev.

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]

Company	CLL Code	Tariff/ICA	Description	Qty.	Rev.
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[illegible][illegible]

ATTACHMENT "B"
ALLTEL response to KYPSC Staff DR No. 1.e.
Total Annual Revenue

Company	Kentucky ALLTEL, Inc.	ALLTEL Kentucky, Inc.
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

ATTACHMENT "C"

ALLTEL response to KYPSC Staff DR No. 2.a.

The total number of "Mass Market" customer accounts by Exchange.

<u>Company</u>	<u>Exchange</u>	<u>Mass Market Customers</u>
Kentucky ALLTEL, Inc.	ALBY	4,282
Kentucky ALLTEL, Inc.	ASLD	12,581
Kentucky ALLTEL, Inc.	BERE	8,326
Kentucky ALLTEL, Inc.	BRSD	4,250
Kentucky ALLTEL, Inc.	BRVL	456
Kentucky ALLTEL, Inc.	BSVL	1,450
Kentucky ALLTEL, Inc.	BTVL	1,694
Kentucky ALLTEL, Inc.	CECL	3,032
Kentucky ALLTEL, Inc.	CLMA	5,176
Kentucky ALLTEL, Inc.	CMVL	10,104
Kentucky ALLTEL, Inc.	CTBG	2,638
Kentucky ALLTEL, Inc.	EWNG	910
Kentucky ALLTEL, Inc.	EZTW	16,445
Kentucky ALLTEL, Inc.	FICT	1,703
Kentucky ALLTEL, Inc.	FMBG	3,575
Kentucky ALLTEL, Inc.	GLSG	4,238
Kentucky ALLTEL, Inc.	GNBG	3,893
Kentucky ALLTEL, Inc.	GNUP	3,871
Kentucky ALLTEL, Inc.	GRSN	1,077
Kentucky ALLTEL, Inc.	GYSN	6,410
Kentucky ALLTEL, Inc.	HGVL	2,996
Kentucky ALLTEL, Inc.	HLBO	1,046
Kentucky ALLTEL, Inc.	HTVL	2,034
Kentucky ALLTEL, Inc.	HZRD	9,088
Kentucky ALLTEL, Inc.	LBNN	5,275
Kentucky ALLTEL, Inc.	LBRT	5,354
Kentucky ALLTEL, Inc.	LNCS	3,458
Kentucky ALLTEL, Inc.	LRTT	877
Kentucky ALLTEL, Inc.	LTFD	3,997
Kentucky ALLTEL, Inc.	LTWD	477
Kentucky ALLTEL, Inc.	LXTN	103,066
Kentucky ALLTEL, Inc.	MDWY	1,008
Kentucky ALLTEL, Inc.	MEDS	5,900
Kentucky ALLTEL, Inc.	MNTI	7,440
Kentucky ALLTEL, Inc.	MRHD	8,459
Kentucky ALLTEL, Inc.	NANC	1,071
Kentucky ALLTEL, Inc.	NCVL	11,106
Kentucky ALLTEL, Inc.	OLHL	4,238
Kentucky ALLTEL, Inc.	OWVL	2,383
Kentucky ALLTEL, Inc.	PNLC	858
Kentucky ALLTEL, Inc.	RSSL	7,982
Kentucky ALLTEL, Inc.	SCVL	787
Kentucky ALLTEL, Inc.	SHBG	763
Kentucky ALLTEL, Inc.	SHDN	2,403
Kentucky ALLTEL, Inc.	SLLC	894

<u>Company</u>	<u>Exchange</u>	<u>Mass Market Customers</u>
Kentucky ALLTEL, Inc.	SMRT	12,470
Kentucky ALLTEL, Inc.	SSHR	2,840
Kentucky ALLTEL, Inc.	TLBO	1,216
Kentucky ALLTEL, Inc.	TMVL	2,931
Kentucky ALLTEL, Inc.	VICC	1,412
Kentucky ALLTEL, Inc.	VNBG	2,846
Kentucky ALLTEL, Inc.	VRSL	8,520
Kentucky ALLTEL, Inc.	WLMR	2,352
Kentucky ALLTEL, Inc.	AGST	1,031
Kentucky ALLTEL, Inc.	ARTN	458
Kentucky ALLTEL, Inc.	BBVL	6,679
Kentucky ALLTEL, Inc.	BESP	2,532
Kentucky ALLTEL, Inc.	BKVL	1,307
Kentucky ALLTEL, Inc.	BRHD	1,623
Kentucky ALLTEL, Inc.	BRWL	832
Kentucky ALLTEL, Inc.	BWVL	2,008
Kentucky ALLTEL, Inc.	CKSN	3,519
Kentucky ALLTEL, Inc.	CLCT	2,210
Kentucky ALLTEL, Inc.	CLMB	184
Kentucky ALLTEL, Inc.	CMLD	2,086
Kentucky ALLTEL, Inc.	CYVL	2,604
Kentucky ALLTEL, Inc.	DOVR	254
Kentucky ALLTEL, Inc.	EBNK	2,509
Kentucky ALLTEL, Inc.	EBRN	2,547
Kentucky ALLTEL, Inc.	EVRS	2,307
Kentucky ALLTEL, Inc.	FBSH	1,242
Kentucky ALLTEL, Inc.	FICT	367
Kentucky ALLTEL, Inc.	FLLC	1,406
Kentucky ALLTEL, Inc.	FRNL	662
Kentucky ALLTEL, Inc.	GMTW	318
Kentucky ALLTEL, Inc.	IRVN	5,719
Kentucky ALLTEL, Inc.	JHVL	662
Kentucky ALLTEL, Inc.	JNKN	1,589
Kentucky ALLTEL, Inc.	LOND	15,557
Kentucky ALLTEL, Inc.	LVTN	422
Kentucky ALLTEL, Inc.	LWGM	569
Kentucky ALLTEL, Inc.	MLBN	280
Kentucky ALLTEL, Inc.	MMCV	51
Kentucky ALLTEL, Inc.	MNCH	6,824
Kentucky ALLTEL, Inc.	MTOL	901
Kentucky ALLTEL, Inc.	MTVR	4,067
Kentucky ALLTEL, Inc.	MYLC	643
Kentucky ALLTEL, Inc.	ONED	809
Kentucky ALLTEL, Inc.	PRCY	889
Kentucky ALLTEL, Inc.	SCHL	2,856
Kentucky ALLTEL, Inc.	SMGV	1,590

<u>Company</u>	<u>Exchange</u>	<u>Mass Market Customers</u>
Kentucky ALLTEL, Inc.	SMLD	1,561
Kentucky ALLTEL, Inc.	SOVL	1,102
Kentucky ALLTEL, Inc.	UNTW	718
Kentucky ALLTEL, Inc.	WASH	1,643
Kentucky ALLTEL, Inc.	WHLL	1,112
	COMPANY TOTAL	411,907
<u>Company</u>	<u>Exchange</u>	<u>Mass Market Customers</u>
ALLTEL Kentucky, Inc.	FICT	72
ALLTEL Kentucky, Inc.	MTWS	6,103
ALLTEL Kentucky, Inc.	SHPV	9,078
ALLTEL Kentucky, Inc.	ZNTN	8,676
	COMPANY TOTAL	23,929

ATTACHMENT "D"
ALLTEL response to KYPSC Staff DR No. 2.c.
Customers and revenue lost in to competitors.

Kentucky ALLTEL, Inc. 2002

[illegible]

[illegible]

Kentucky ALLTEL, Inc. 2002

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Kentucky ALLTEL, Inc. 2002

[illegible]

ALLTEL KENTUCKY, Inc. 2002

[illegible]

[illegible]

[illegible]

KENTUCKY ALLTEL, INC. 2003

Exchange Name		Net (Gain/ Loss)	Nuvox	Geitel	MCI	SCRT	Brandenburg	AT&T Broadband	Adelphia	AT&T Local	TCG of Ohio	New South	North Central	Total

[illegible][illegible]